

ROBERT ALAN DAHL, ESQ.

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June 3, 1997

Jennifer Henry
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4633

Dear Ms. Henry:

This letter is the response of Congressman Bob Riley and of Bob Riley for Congress, the principal campaign committee for Congressman Riley, and Donna Rose Suggs, as Treasurer, to the complaint filed by James Anderson in Matter Under Review (MUR) 4633.

Mr. Anderson's complaint is only tangentially directed to Congressman Riley or his campaign. The complainant's main allegations are based solely upon speculation about the circumstances of contributions to conservative political action committees during the 1996 campaign season by Robert Riley, Jr., and contributions from a number of PACs to the Riley campaign. The complaint then asserts "Congressman Riley and his committee have also violated the Act by accepting excessive contributions from his son."

Neither Congressman Riley nor his campaign committee accepted excessive contributions from Robert Riley, Jr. The public record shows that contributions to Bob Riley for Congress from Robert Riley, Jr., were within the legal limits for the primary, runoff and general elections.

The public record also shows that the Bob Riley for Congress campaign received dozens of contributions from conservative political action committees in what was widely regarded as an important and competitive race. Further, as demonstrated by the affidavits of Congressman Riley, Mrs. Suggs and the Campaign Manager, Billie Joe Johnson, persons associated with the campaign committee bore no responsibility for the contributions to PACs at issue in this matter and had no specific knowledge of them at the time.

The complainant seeks to goad the Commission into an investigation by mischaracterizing the actions and intentions of persons involved in this situation. The objective facts simply do not justify an investigation, however. Congressman Bob Riley and Bob Riley for Congress respectfully request the Commission to take no action in this matter.

Sincerely,



Robert Alan Dahl

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BEFORE THE FEDERAL ELECTION COMMISSION

AFFIDAVIT OF BILLIE JOE JOHNSON, JR.

Billie Joe Johnson, Jr. states the following on information and belief, and to the best of his personal knowledge, as to facts and circumstances related to Matter Under Review 4633 before the Federal Election Commission ("FEC"):

1. I served as Campaign Manager for Bob Riley for Congress, the principal campaign committee for Congressman Robert Riley of Alabama, in the period approximately from December 1995 to December 1996.
2. As Campaign Manager. I supervised and participated in all activities of the committee during the 1996 campaign, including political and fundraising operations.
3. I met with Carolyn Malenick of Triad Management Services, Inc. ("Triad") in spring 1996, a few weeks before our primary election, when Triad conducted an assessment of the viability of our campaign in order to determine whether to recommend to their clients that they contribute to us. I had numerous subsequent contacts with employees of Triad during the primary and run-off election periods. I most often communicated with Carlos Rodriguez of Triad, who I understood to be analyzing races on behalf of the political action committee ("PAC") community. I viewed a favorable assessment of our campaign by Triad and their recommendation of us to conservative PACs as very important to our prospects for success, particularly during the early period.
4. During the time of their interest in and assistance to us, Triad asked the campaign to provide information about potential donors in our local area who could be solicited to support PACs with whom Triad consulted. We provided some information about potential donors to Triad, but did not contact those persons directly on behalf of Triad or any PACs.
5. I had no personal contact with anyone associated with the PACs whose contributions are at issue in this matter. Some or all of these PACs may likely have been included in the mailing list of PACs to whom the campaign routinely mailed information and general requests for support, but I did not solicit contributions from

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or communicate with these specific PACs and am unaware of anyone else involved in the campaign doing so.

6. It became evident in the final days before the primary and into the Run-off period that the campaign was receiving substantial support from the PAC community. I believed a significant portion of that support was the direct result of Triad's recommendations or the indirect result of early influential PAC support that Triad had helped facilitate (including the endorsement of the National Rifle Association prior to our heavily contested primary election). Rob Riley and I may have discussed at that time the fairly obvious help in raising funds from PACs that Triad was then providing. Until publication of the recent news story that is the basis for the complaint in this matter, however, I was unaware Rob Riley, Jr. had contributed to any PACs in 1996.

The above information is true and correct to the best of my knowledge and belief.


BILLIE JOE JOHNSON, JR.

Sworn and subscribed to in Birmingham, Alabama, by the said Billie Joe Johnson, Jr. on the 23rd day of May 1997.


Notary Public

My commission expires: MY COMMISSION EXPIRES AUGUST 3, 1999

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BEFORE THE FEDERAL ELECTION COMMISSION

AFFIDAVIT OF ROBERT R. RILEY

Robert R. Riley states the following on information and belief, and to the best of his personal knowledge, as to facts and circumstances related to Matter Under Review 4633 before the Federal Election Commission ("FEC"):

1. I was a candidate for the U.S. House of Representatives in 1996 and was elected in November 1996. My principal campaign committee is Bob Riley for Congress.
2. I met with representatives of Triad Management Services, Inc. (Triad"), during contacts with various conservative organizations and consultants at the start of our campaign. I recall that Triad employees came to my Congressional district in the spring of 1996 to assess the viability of our campaign for purposes of advising their clients. We soon began receiving contributions from political action committees ("PACs") and individuals we believed resulted directly or indirectly from favorable recommendations from Triad.
3. During the period before the primary election, I was aware that my son, Robert Riley, Jr., was grateful to Triad for their recommendations to donors regarding our campaign, that he was impressed with Triad's consulting services and that he was considering making contributions to conservative PACs that had been recommended by Triad as supportive of good candidates across the country.
4. I did not know at the time to which PACs Rob ultimately contributed. I am not aware of having had any direct contact with the PACs to which Rob contributed.
5. It is inconceivable to me that Rob would have contributed to these PACs with any understanding or expectation that his funds would then be contributed to my campaign. Based upon my familiarity with him and with the circumstances at issue, it is my belief he gave to these PACs because of his support for conservative candidates and ideals and because of his gratitude to the PAC community generally.

The above information is true and correct to the best of my knowledge and belief.


ROBERT R. RILEY

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Sworn and subscribed to in Washington, D.C., by the said Robert R. Riley
on the 3rd day of June 1997.

DISTRICT OF COLUMBIA



Notary Public

My commission expires: _____

DAVID J. ROBINSON
Notary Public
District of Columbia
My Commission Expires September 14, 1997

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BEFORE THE FEDERAL ELECTION COMMISSION

AFFIDAVIT OF DONNA ROSE SUGGS

Donna Rose Suggs states the following on information and belief, and to the best of her personal knowledge, as to facts and circumstances related to Matter Under Review 4633 before the Federal Election Commission ("FEC"):

1. I have served as Treasurer of Bob Riley for Congress, the principal campaign committee for Congressman Robert Riley of Alabama, since November 1995.
2. As committee Treasurer, I supervised all financial activity of the committee during the 1996 election campaign and personally conducted tasks related thereto, including monitoring all receipts and making bank deposits, monitoring all expenditures and writing checks from the committee account, and recordkeeping and FEC reporting. I also served as office manager of the campaign headquarters, involving, among other duties, responsibility for supervising office personnel and for opening mail.
3. I am unaware of having any personal contact at any time with anyone associated with the PACs whose contributions are at issue in this matter. I handled all PAC contribution checks in a routine manner, and deposited them promptly.
4. While I discussed the campaign's general financial situation with Rob Riley, Jr., during the course of the election campaign, I had no conversations with him at the time regarding any contributions he may have been considering or may have made to these or any other PACs, and had no conversations with him about contributions to Bob Riley for Congress from these particular PACs. Until publication of the recent news story that is the basis for the complaint in this matter, I was unaware Rob Riley, Jr., had contributed to any PACs in 1996 or had discussed making such contributions with Triad.

The above information is true and correct to the best of my knowledge and belief.

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Donna Rose Suggs
DONNA ROSE SUGGS

Sworn and subscribed to in Ashland, Alabama, by the said Donna Rose Suggs
on the 23 day of May 1997.

Donna Rose Suggs
Notary Public

My Commission Expires: NOTARY PUBLIC STATE OF ALABAMA AT LARGE.
MY COMMISSION EXPIRES: Mar. 28, 1999.
BONDED THROUGH NOTARY PUBLIC UNDERWRITERS.

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